

Exhibit E

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, et al.,	§
	§
Plaintiffs	§
VS.	§
	§
GREG ABBOTT, et al.,	§
	§
Defendants.	§

DECLARATION OF JUANITA VALDEZ-COX

I, Juanita Valdez-Cox, in accordance with the provisions of 28 U.S.C § 1746, declare as follows:

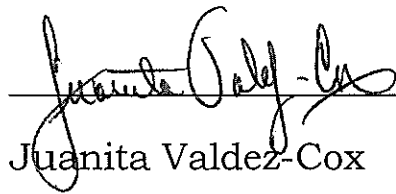
1. My name is Juanita Cox and I am the executive director of La Union del Pueblo Entero (LUPE). LUPE is one of the intervenors in the Voter ID litigation.
2. LUPE is a nonprofit organization based in San Juan in the Rio Grande Valley. Our mission is to improve our community by encouraging civic engagement.
3. To promote civic engagement, LUPE is dedicating substantial resources this fall to a non-partisan Get Out The Vote Campaign. We will have at least seven staff members dedicating between 30 and 100% of their time to this issue between now and election day. We are in the process of recruiting and training 70 “Capitanes de Votos” who will be leaders in this effort.

4. In our experience, eligible voters living in our community face many, many barriers to voting. They may not know how to vote, lack transportation, their registration may have been purged due to a move, their name may not appear the same on their documents, or they may be out of the valley doing migrant farmwork, to name just some of the many barriers to voting faced by voters in our community.
5. As part of LUPE's Get Out The Vote Campaign, we are telling people about the ID they need to bring to the polls. We have already seen many people do not know what ID they need in order to vote. We have also heard that people have been turned away at the polls *with* proper SB 14 ID (for example, when a driver's license had expired days earlier). Between now and election day, we will be spending a lot of time and resources informing voters of the new ID standards and the declaration for voters without SB 14 ID.
6. I have seen the statements made by the Texas Attorney General and Harris County Clerk and Election Official Stan Stanart. LUPE believes that statements like these, threatening prosecution, are going to frighten people from going to the polls. Many people in our community live in extreme poverty, have limited education, and little or no voting experience. They are often unwilling to take any risks, perceived or otherwise, that might jeopardize the fragile well-being of their family. News reports that the government may criminally prosecute people who have voted, for whatever reason, will keep people away from the polls. It is that simple.
7. The barriers to increasing voter turnout in the Rio Grande Valley are substantial. Politicians and election officials intimidating voters from showing up to vote will not only frustrate LUPE's efforts to increase civic engagement, it will keep minority voters from voting.

8. Threats of criminal prosecution of voters, like the statements already made, effectively discourage minority voters from voting. Election procedures are already complicated. In addition to frightening would-be-voters, these statements increase voter confusion.
9. Finally, threatening statements make it difficult for LUPE to convince voters without an SB14 ID to sign a reasonable impediment declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 11th day of September, 2016.



Juanita Valdez-Cox